



121 Champion Way  
Canonsburg, PA 15317  
Writer's Direct Dial Number  
724-597-8670  
tmckenzie@rrienergy.com

May 29, 2009

**Via Certified Mail**

Mr. William Weaver  
Air Quality Program Manager  
PA Department of Environmental Protection  
909 Elmerton Avenue  
Harrisburg, PA 17110

RECEIVED  
JUN 01 2009  
Air Protection Division  
(3AP10)

Subject: **Administrative Amendment - Notice of Name Change  
From Reliant Energy Wholesale Generation, LLC to  
RRI Energy Wholesale Generation, LLC  
Hunterstown Combined Cycle Plant – Title V Permit 01-05029 &  
AR-01-05029**

Dear Mr. Weaver:

This letter confirms and serves as formal notice that, effective May 2, 2009, Reliant Energy, Inc. changed its company name to RRI Energy, Inc. Documentation evidencing the name change is attached for your records. A similar name change also went into effect for all subsidiaries of Reliant Energy, Inc that contained "Reliant" in their names. A schedule is attached that shows the subsidiary's former and new corporate name. As a result, Reliant Energy Wholesale Generation, LLC was renamed RRI Energy Wholesale Generation, LLC. Please amend the subject permits to reflect this name change. The following documents are also attached for this amendment request:

- Request for State Only/Title V Operating Permit Administrative Amendment
- First Page -- Title V Operating Permit Application
- Amended Air Pollution Control Act Compliance Review Form
- Check in the amount of \$1,500

If you have any questions or require additional information regarding this change, please contact Brian Green at (724)-597-8219.

Sincerely,

Timothy E. McKenzie  
Sr. Air Environmental Specialist

TEM/jk/TEM1159R

cc: US EPA – Region III

RE WHOLESALE GENERATION, LLC HUNTERSTOWN STATION

REFERENCE NUMBER	DATE	VOUCHER	GROSS AMOUNT	DISCOUNT	NET AMOUNT
NAME CHANGE	05/20/2009	1700001718	\$1,500.00	0.00	\$1,500.00

CHECK NUMBER	DATE	VENDOR NUMBER	VENDOR NAME	TOTAL AMOUNT
1004498	05/20/2009	0000164026	PENNSYLVANIA CLEAN AIR FUND	\$1,500.00

Refer to above check number and voucher number when inquiring about your payment

"VERIFICATION BOX" (RIGHT OF ARROW, HOLD BETWEEN THUMB AND FOREFINGER, OR BREATHE ON IT. COLOR WILL DISAPPEAR, THEN REAPPEAR). → 0172



RE WHOLESALE GENERATION, LLC HUNTERSTOWN STATION  
HOUSTON, TEXAS

60-160  
433

Vendor Number: 0000164026

Date: 05/20/2009

Check Number: 1004498

PAY *One thousand five hundred and 00/100 Dollars*

TO THE  
ORDER OF

Pay Exactly  
\*\*\*\*\*\$1,500.00

PENNSYLVANIA CLEAN AIR FUND  
909 ELMERTON AVENUE  
HARRISBURG PA 17110-8200

The Bank of New York Mellon  
PITTSBURGH, PA. 15262



*Andrew J. Chambers*  
AUTHORIZED SIGNATURE

VOID WITHOUT SIGNATURE  
VOID AFTER NINETY DAYS.

THIS DOCUMENT CONTAINS AN EMBEDDED WATERMARK VISIBLE IF HELD TO A LIGHT. ABSENCE OF THIS FEATURE INDICATES ALTERATION AND SHOULD BE VOID.

1004498 043301601 1190109

# Delaware

PAGE 1

*The First State*

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF OWNERSHIP, WHICH MERGES:

"RELIANT ENERGY NEWCO, INC.", A DELAWARE CORPORATION,  
WITH AND INTO "RELIANT ENERGY, INC." UNDER THE NAME OF "RRI ENERGY, INC.", A CORPORATION ORGANIZED AND EXISTING UNDER THE LAWS OF THE STATE OF DELAWARE, AS RECEIVED AND FILED IN THIS OFFICE THE FIRST DAY OF MAY, A.D. 2009, AT 7:47 O'CLOCK A.M.

AND I DO HEREBY FURTHER CERTIFY THAT THE EFFECTIVE DATE OF THE AFORESAID CERTIFICATE OF OWNERSHIP IS THE SECOND DAY OF MAY, A.D. 2009, AT 12:01 O'CLOCK A.M.

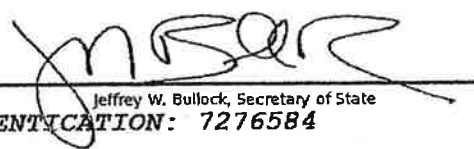
A FILED COPY OF THIS CERTIFICATE HAS BEEN FORWARDED TO THE NEW CASTLE COUNTY RECORDER OF DEEDS.

3271860 8100M

090417773

You may verify this certificate online  
at [corp.delaware.gov/authver.shtml](http://corp.delaware.gov/authver.shtml)



  
Jeffrey W. Bullock, Secretary of State  
AUTHENTICATION: 7276584

DATE: 05-01-09

STATE OF DELAWARE  
CERTIFICATE OF OWNERSHIP AND MERGER  
SUBSIDIARY INTO PARENT

Certificate of Ownership  
MERGING

Reliant Energy Newco, Inc.  
(a Delaware corporation)  
into

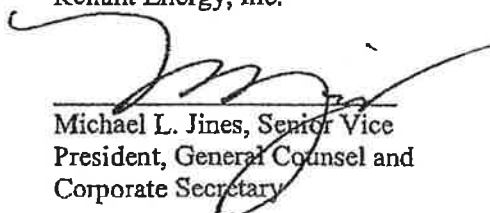
Reliant Energy, Inc.  
(a Delaware corporation)

PURSUANT TO SECTION 253 OF THE GENERAL CORPORATION LAW OF DELAWARE ("DGCL"), Reliant Energy, Inc., a corporation incorporated on August 9, 2000 pursuant to the provisions of the DGCL ("Parent"), DOES HEREBY CERTIFY:

1. Parent owns 100% of the capital stock of Reliant Energy Newco, Inc., a corporation incorporated on April 17, 2009, pursuant to the provisions of the DGCL ("Subsidiary").
2. By resolution ("Resolution of Merger") of the Board of Directors of Parent duly adopted at a meeting held on April 22, 2009, Parent determined to (i) merge the Subsidiary with and into the Parent and (ii), effective upon the merger, change the corporate name of the Parent to RRI Energy, Inc. A certified copy of the Resolution of Merger is attached to, and incorporated into, this Certificate of Ownership and Merger as Exhibit A.
3. At the Effective Time (as defined below), by virtue of the merger and without any action on the part of Parent, each issued and outstanding share of Subsidiary shall be cancelled and retired.
4. Pursuant to Section 103(d) of the DGCL, the effective time of the Certificate of Ownership and Merger, and the time when the merger therein provided for, shall become effective shall be 12:01 AM (Eastern Time) on May 2, 2009 (the "Effective Time").

IN WITNESS WHEREOF, this Certificate of Ownership and Merger is hereby executed on behalf of Reliant Energy, Inc. as of April 30, 2009.

Reliant Energy, Inc.



Michael L. Jines, Senior Vice  
President, General Counsel and  
Corporate Secretary

**RELIANT ENERGY, INC.**

**Assistant Secretary's Certificate**

The undersigned certifies that she is the duly qualified, appointed and acting Assistant Secretary of Reliant Energy, Inc., a Delaware corporation; and

She further certifies that at a meeting of the Board of Directors, dated April 22, 2009, the following resolutions were adopted and that such resolutions have not since been amended or rescinded and are in full force and effect as of the date hereof:

WHEREAS, Reliant Energy, Inc., a Delaware corporation (the "Company"), has entered into a LLC Membership Purchase Agreement by and between the Company and a subsidiary of NRG Energy, Inc. dated as of February 28, 2009 (the "Purchase Agreement"); and

WHEREAS, the Company has agreed to change its corporate name within three business days after the closing of transactions contemplated by the Purchase Agreement; and

WHEREAS, subject to the closing of transactions contemplated by the Purchase Agreement, the Company desires to change the name of the Company from "Reliant Energy, Inc." to "RRI Energy, Inc."; and

WHEREAS, in accordance with Section 253(a) and (b) of the Delaware General Corporation Law, the Company may effect such name change by merging its wholly-owned subsidiary, Reliant Energy Newco, Inc., a Delaware corporation, with and into the Company (the "Merger") and changing the surviving company's name to "RRI Energy, Inc." (the "Name Change"); and

WHEREAS, the Company shall be the surviving company in the Merger; and

WHEREAS, the Board of Directors of the Company has determined that it would be in the best interest of the Company and its stockholders to effect the Merger and the Name Change;

NOW, THEREFORE, BE IT RESOLVED, that, subject to the closing of transactions contemplated by the Purchase Agreement, the Board hereby authorizes the Merger, agrees to assume the liabilities and obligations of Reliant Energy Newco, Inc. following the Merger and authorizes the Name Change; and further

RESOLVED, that, subject to the closing of transactions contemplated by the Purchase Agreement, the Board hereby approves amendments to and a restatement of the Company Bylaws in substantially the form attached hereto as Exhibit A, to reflect the Name Change; and further

Exhibit A

RESOLVED, that, subject to the closing of the transactions contemplated by the Purchase Agreement, the Board hereby approves and authorizes amendment of the employee benefit plans and arrangements set forth on Exhibit B hereto and any other employee benefit plans and arrangements sponsored by the Company (the "Plans"), to reflect the Name Change throughout all documents relating to such Plans;

RESOLVED, that the officers of the Company be, and each of them individually hereby is, authorized and empowered, in the name and on behalf of the Company to (i) take or cause to be taken any and all such further actions and to prepare, execute and deliver or cause to be prepared, executed and delivered, and where necessary or appropriate, file or cause to be filed with the appropriate governmental authorities, all such other instruments and documents, including but not limited to all certificates, consents, contracts, bonds, agreements, documents, instruments, receipts or other papers, and any amendments, extensions, supplements or modifications thereto to effectuate the foregoing resolutions, (ii) incur and pay or cause to be paid all fees and expenses and (iii) engage such persons as each such officer shall in his judgment determine to be necessary or appropriate to carry out fully the intent and purposes of the foregoing resolutions and each of the transactions contemplated thereby; and further

RESOLVED, that, to the extent necessary, the appropriate officers of the Company be and they hereby are authorized to submit the Plans as amended pursuant to the foregoing resolutions (or supplement any current submission), together with such supporting information and other documents as they may deem necessary or desirable, to the appropriate District Director of Internal Revenue for his consideration and the issuance in respect thereof of favorable determination letters, and in connection therewith to make such amendments or changes to the Plans, or to such supporting information and documents, and to take such other and further action as such officers may determine to be necessary or desirable to secure such approval and such favorable determination letters regarding the initial or continued qualified status of the Plans under Sections 401(a) and 501(a) of the Code and to take, or cause to be taken, any other actions they deem necessary or appropriate in connection with the foregoing resolutions; and further

RESOLVED, that the Corporate Secretary and any Assistant Corporate Secretary of the Company are each hereby authorized to certify and attest any documents which he or she may deem necessary or appropriate to consummate the transactions contemplated by the documents heretofore authorized and approved, provided that such attestation shall not be required for the due authorization, execution and delivery or validity of the particular document; and further

RESOLVED, that the foregoing powers and authorizations shall continue in full force and effect until revoked in writing by the Company; and further

RESOLVED, that all actions previously taken by any officer or director of the Company in connection with the transactions contemplated by the foregoing resolutions are hereby adopted, ratified, confirmed and approve in all respects.

**Exhibit A**

I FURTHER CERTIFY that the foregoing resolutions have not been altered, modified, revoked or rescinded, and that the same remain in full force and effect on the date hereof.

IN WITNESS WHEREOF, I have executed this certificate as of April 22, 2009.

  
Allison B. Cunningham  
Assistant Secretary

# **RELIANT ENERGY, INC. AND SUBSIDIARIES**

## Name Changes

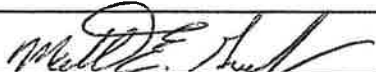
Former Company Name	New Company Name
Conemaugh Fuels, LLC	No Name Change
Keystone Fuels, LLC	No Name Change
Orion Power Atlantic, Inc.	No Name Change
Orion Power Capital, LLC	No Name Change
Orion Power Development Company, Inc.	No Name Change
Orion Power Holdings, Inc.	No Name Change
Orion Power Marketing and Supply, Inc.	No Name Change
Orion Power Midwest GP, Inc.	No Name Change
Orion Power Midwest LP, LLC	No Name Change
Orion Power Midwest, L.P.	No Name Change
Orion Power New York GP, Inc.	No Name Change
Orion Power New York LP, LLC	No Name Change
Orion Power New York, L.P.	No Name Change
Orion Power Operating Services MidWest, Inc.	No Name Change
Orion Power Operating Services, Inc.	No Name Change
PowerTree Carbon Company, LLC	No Name Change
Reliant Energy Asset Management, LLC	RRI Energy Asset Management, LLC
Reliant Energy Broadband, Inc.	RRI Energy Broadband, Inc.
Reliant Energy California Holdings, LLC	RRI Energy California Holdings, LLC
Reliant Energy Communications, Inc.	RRI Energy Communications, Inc.
Reliant Energy Coolwater, Inc.	RRI Energy Coolwater, Inc.
Reliant Energy Corporate Services, LLC	RRI Energy Corporate Services, LLC
Reliant Energy Electric Solutions, LLC	RRI Energy Electric Solutions, LLC
Reliant Energy Ellwood, Inc.	RRI Energy Ellwood, Inc.
Reliant Energy Etiwanda, Inc.	RRI Energy Etiwanda, Inc.
Reliant Energy Florida, LLC	RRI Energy Florida, LLC
Reliant Energy Foundation	RRI Energy Foundation
Reliant Energy Key/Con Fuels, LLC	RRI Energy Key/Con Fuels, LLC
Reliant Energy Mandalay, Inc.	RRI Energy Mandalay, Inc.
Reliant Energy Mid-Atlantic Power Holdings, LLC	RRI Energy Mid-Atlantic Power Holdings, LLC
Reliant Energy Mid-Atlantic Power Services, Inc.	RRI Energy Mid-Atlantic Power Services, Inc.
Reliant Energy Midwest, LLC	RRI Energy Midwest, LLC
Reliant Energy Northeast Generation, Inc.	RRI Energy Northeast Generation, Inc.
Reliant Energy Northeast Holdings, Inc.	RRI Energy Northeast Holdings, Inc.
Reliant Energy Northeast Management Company	RRI Energy Northeast Management Company
Reliant Energy Ormond Beach, Inc.	RRI Energy Ormond Beach, Inc.
Reliant Energy Power Generation, Inc.	RRI Energy Power Generation, Inc.
Reliant Energy Services, Inc.	RRI Energy Services, Inc.
Reliant Energy Solutions East, LLC	RRI Energy Solutions East, LLC
Reliant Energy Solutions Northeast, LLC	RRI Energy Solutions Northeast, LLC
Reliant Energy Wholesale Generation, LLC	RRI Energy Wholesale Generation, LLC
Reliant Energy, Inc.	RRI Energy, Inc.





**COMMONWEALTH OF PENNSYLVANIA**  
**DEPARTMENT OF ENVIRONMENTAL PROTECTION**  
**BUREAU OF AIR QUALITY**

**Request for State Only/Title V Operating Permit Administrative Amendment**  
**(in accordance with 25 Pa. Code § 127.450)**

1.	<b>Applicant's Name:</b>	RRI ENERGY WHOLESALE GENERATION, LLC	<b>Federal Tax ID:</b> 20-1253947
	<b>Facility Name:</b>	RRI ENERGY HUNTERSTOWN POWER STATION	
<b>Street Address or Route Number of Source:</b> 1731 Hunterstown Rd. Gettysburg, PA 17325			
<b>Township/Municipality:</b> Straban Township			<b>County:</b> Adams
2. Mark appropriate box(es) regarding the basis for this request.			
<input type="checkbox"/> Corrects typographical errors			
<input checked="" type="checkbox"/> Identifies a change in the name, address or phone number of the Responsible Official identified in the permit or provides a similar change			
<input type="checkbox"/> Requires more frequent monitoring or reporting by the permittee			
<input type="checkbox"/> Allows for a change in ownership or an operational control of a source in accordance with § 127.450(a)(4) <i>(Complete the Change of Ownership Form and a Compliance Review Form)</i>			
<input type="checkbox"/> Incorporates plan approval requirements into an operating permit in accordance with § 127.450(a)(5)			
3. <b>Operating Permit/Plan Approval No(s):</b> Title V Operating Permit # 01-05029 and AR-01-05029			
4. <b>Describe in detail the reasons for submission of this request. Attach additional sheet(s) if necessary.</b>			
<u>Name Change Only - From Reliant Energy Wholesale Generation, LLC. to RRI Energy Wholesale Generation, LLC</u>			
5. <b>Contact Person Name:</b> Brian Green			<b>Title:</b> Air Environmental Specialist II
<b>Mailing Address:</b> 121 Champion Way, Suite 200 Canonsburg, PA 15317			<b>Telephone Number:</b> (724)-597-8219
			<b>Fax Number:</b> (724)-597-8878
<b>Certification by Responsible Official</b>			
Subject to the penalties of Title 18 Pa. C.S. Section 4904 and 35 P.S. Section 4009 (b) (2), I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this form are true, accurate, and complete.			
<b>Name:</b> Matt E. Greek			<b>Title:</b> Vice President
<b>Signed:</b> 			<b>Date:</b> 5-28-09



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF AIR QUALITY

## **“Request for State Only/Title V Operating Permit Administrative Amendment” Form Instructions**

### General Guidance:

This form shall be used only for the categories listed in Section 2 of this application.

**Administrative Amendment Application Fees:** The applicant submitting a request for an administrative amendment must pay the appropriate operating permit processing fee.

The operating permit processing fee is:

For non-Title V facility, three hundred dollars (\$300) for application filed during the 2004-2004 calendar years and three hundred seventy five (\$375) for applications filed beginning in 2005.

For Title V facility, Six hundred fifteen dollars (\$615) for applications filed during the 2004-2004 calendar years and seven hundred fifty dollars (\$750) for applications filed beginning in 2005.

**Note:** If an operating permit processing fee has been submitted as a part of the permit renewal process and information in the permit renewal application indicates that a change-of-ownership has occurred, there is no need to pay a separate change-of-ownership/administrative amendment fee.

Typographical errors, revisions having little or no impact on emissions, or minor corrections of pre-construction estimates based on actual emission tests, are examples of revisions that Department can initiate without requiring the permittee to submit a new application.

### Detailed instructions:

1. Give the name of the person who requests an approval, the name of the facility, Federal Tax ID No., street address or Route number of the source, name of township/municipality and name of the county.
2. Mark the appropriate box(es) for which the application is made. Administrative amendments involving changes of ownership or operational control must be accompanied by a compliance review form. Other types of administrative amendments do not require a compliance review form.
3. Give the operating or plan approval number(s).
4. Give the reasons in detail for submitting this application. Use additional sheets of paper, if the space provided is not sufficient to provide detailed information required for review and approval.
5. Provide contact person name, title, mailing address and telephone number.

A responsible official must sign the request and print his name, title and date.



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF AIR QUALITY

FOR OFFICIAL USE ONLY

Title V OP Number: \_\_\_\_\_

Reviewed by: \_\_\_\_\_

Date: \_\_\_\_\_

## TITLE V OPERATING PERMIT APPLICATION

### Section 1 - General Information

#### 1.1 Application Type

Type of permit for which application is made: (Check one)

☐ Initial☐ Renewal Operating Permit No. \_\_\_\_\_☒ Application Revision - provide date of original Title V Application or OP No.: 01-05029 - Name Change ONLY

#### 1.2 Plant Information

Federal Tax ID/Plant Code: 20-1253947-1Firm Name: RRI Energy Wholesale Generation, LLCSIC Code: 4911Plant Name: RRI Energy Hunterstown Power StationDescription of SIC: Trans. & Utilities - Electric ServiceCounty: Adams CountyMunicipality: Straban TownshipUTM Zone: 18UTM North: 4415017UTM East: 314825Method of Obtaining UTM: US EPA CAMD Business Systems

#### 1.3 Contact Information

Name: Brian W. GreenTitle: Air Quality Specialist IIAddress: 121 Champion Way, Suite 200  
Canonsburg, PA 15317Telephone Number: (724)-597-8219

#### 1.4 Certification of Truth, Accuracy and Completeness

Note: This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate, and complete.

(Signed)

Date: 5-28-09Name (Typed): Matt E. GreekTitle: Vice President



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF AIR QUALITY

## AIR POLLUTION CONTROL ACT COMPLIANCE REVIEW FORM

Fully and accurately provide the following information, as specified. Attach additional sheets as necessary.

### Type of Compliance Review Form Submittal (check all that apply)

- ☐ Original Filing  
☒ Amended Filing

Date of Last Compliance Review Form Filing:

11/01/2004 – Change of ownership – Reliant Energy Hunterstown, LLC merger into Reliant Energy Wholesale Generation, LLC

### Type of Submittal

- ☐ New Plan Approval      ☐ New Operating Permit      ☐ Renewal of Operating Permit  
☐ Extension of Plan Approval      ☐ Change of Ownership      ☐ Periodic Submission (@ 6 mos)  
☒ Other: Name Change from Reliant Energy Wholesale Generation, LLC. to RRI Energy Wholesale Generation, LLC.

### SECTION A. GENERAL APPLICATION INFORMATION

**Name of Applicant/Permittee/("applicant")**  
(non-corporations-attach documentation of legal name)

..... RRI Energy Wholesale Generation, LLC

**Address**      121 Champion Way, Suite 200  
Canonsburg, PA 15317

**Telephone**      724-597-8000      **Taxpayer ID#**      20-1253947

**Permit, Plan Approval or Application ID#**      Title V Operating Permit 01-05029 and AR-01-05029 – Hunterstown Power Station

### Identify the form of management under which the applicant conducts its business (check appropriate box)

- |  |  |  |
|--|--|--|
| <input type="checkbox"/> Individual          | <input type="checkbox"/> Syndicate           | <input type="checkbox"/> Government Agency                                 |
| <input type="checkbox"/> Municipality        | <input type="checkbox"/> Municipal Authority | <input type="checkbox"/> Joint Venture                                     |
| <input type="checkbox"/> Proprietorship      | <input type="checkbox"/> Fictitious Name     | <input type="checkbox"/> Association                                       |
| <input type="checkbox"/> Public Corporation  | <input type="checkbox"/> Partnership         | <input checked="" type="checkbox"/> Other Type of Business, specify below: |
| <input type="checkbox"/> Private Corporation | <input type="checkbox"/> Limited Partnership | Limited Liability Company  |

**Describe below the type(s) of business activities performed.**

Management and operation of electrical generation units.

**SECTION B. GENERAL INFORMATION REGARDING "APPLICANT"**

If applicant is a corporation or a division or other unit of a corporation, provide the names, principal places of business, state of incorporation, and taxpayer ID numbers of all domestic and foreign parent corporations (including the ultimate parent corporation), and all domestic and foreign subsidiary corporations of the ultimate parent corporation with operations in Pennsylvania. Please include all corporate divisions or units, (whether incorporated or unincorporated) and privately held corporations. (A diagram of corporate relationships may be provided to illustrate corporate relationships.) Attach additional sheets as necessary.

Unit Name	Principal Places of Business	State of Incorporation	Taxpayer ID	Relationship to Applicant
RRI Energy, Inc.	1000 Main Street Houston, TX 77002	Delaware	76-0655566	Parent
RRI Energy Power Generation, Inc.	1000 Main Street Houston, TX 77002	Delaware	76-0530625	Parent
RRI Energy Wholesale Generation, LLC	1000 Main Street Houston, TX 77002	Delaware	20-1253947	Applicant
RRI Energy Northeast Holdings, Inc.	1000 Main Street Houston, TX 77002	Delaware	51-0399148	Parent
RRI Energy Northeast Generation, Inc.	1000 Main Street Houston, TX 77002	Delaware	79-0639817	Parent
RRI Energy Mid-Atlantic Power Holdings, LLC	121 Champion Way Canonsburg, PA 15317	Delaware	52-2154847	Affiliate
RRI Energy Mid-Atlantic Power Services, Inc.	121 Champion Way Canonsburg, PA 15317	Delaware	52-2175183	Affiliate
RRI Energy Northeast Management Company	121 Champion Way Canonsburg, PA 15317	Delaware	25-1753949	Affiliate
RRI Energy Key/Con Fuels, LLC	121 Champion Way Canonsburg, PA 15317	Delaware	76-0664189	Affiliate
Conemaugh Fuels, LLC	682 Philadelphia Street Indiana, PA 15701	Delaware	13-4210287	Affiliate
Keystone Fuels, LLC LLC (member managed)	121 Champion Way Canonsburg, PA 15317	Delaware		Affiliate
Orion Power Holdings, Inc.	682 Philadelphia Street Indiana, PA 15701	Delaware	52-2087649	Affiliate
Orion Power Capital, LLC	1000 Main Street Houston, TX 77002	Delaware	01-0748328	Affiliate
Orion Power Midwest GP, Inc.	1000 Main Street Houston, TX 77002	Delaware	94-3358938	Affiliate
Orion Power Midwest LP, LLC	1000 Main Street Houston, TX 77002	Delaware	94-3358939	Affiliate
Orion Power MidWest, LP	1000 Main Street Houston, TX 77002	Delaware	52-2201498	Affiliate

Please refer to diagrams in Attachment A to understand corporate relationships

**SECTION C. SPECIFIC INFORMATION REGARDING APPLICANT AND ITS "RELATED PARTIES"**

**Pennsylvania Facilities.** List the name and location (mailing address, municipality, county), telephone number, and relationship to applicant (parent, subsidiary or general partner) of applicant and all Related Parties' places of business, and facilities in Pennsylvania. Attach additional sheets as necessary.

Unit Name	Street Address	County and Municipality	Telephone No.	Relationship to Applicant
Blossburg	US Route 15 North Blossburg, PA	Tioga County Covington Twp.	717-338-3514	Affiliate
Brookville Maintenance	Route 28 South and South Main Street Brookville, PA	Jefferson County Brookville Borough	814-849-3088	Affiliate
Conemaugh	1442 Power Plant Road New Florence, PA	Indiana County West Wheatfield Twp.	724-235-2711	Affiliate
Gilbert Terminal	2350 Applebutter Road Hellertown, PA	Northampton County Lower Saucon Twp.	610-327-5331	Affiliate
Hamilton	Mummers Church Road Abbottstown, PA	Adams County Hamilton Twp.	717-338-3514	Affiliate
Hunterstown	1731 Hunterstown Road Gettysburg, PA 17325	Adams County Straban Twp.	717-338-3500	Affiliate
Keystone	313 Keystone Drive Shelock, PA	Armstrong County Plumcreek Twp.	717-338-3514	Affiliate

Mountain	1 Mountain Street Mount Holly Springs, PA	Cumberland County South Middleton Twp.	717-338-3514	Affiliate
Orrtanna	Knoxlyn-Orrtanna Road Orrtanna, PA	Adams County Highland Twp.	717-338-3514	Affiliate
Portland	5027 River Road Portland, PA	Northampton County Upper Mt. Bethel Twp.	570-897-6113	Affiliate
Seward	595 Plant Road New Florence, PA	Indiana County East Wheatfield Twp.	814-446-5641	Affiliate
Shawnee	Fenical Lane Bushkill, PA	Monroe County Middle Smithfield Twp.	570-897-6113	Affiliate
Shawville	250 Power Plant Drive Shawville, PA	Clearfield County Bradford Twp.	814-765-6508	Affiliate
Southpointe Office	121 Champion Way Canonsburg, PA	Washington County Cecil Twp.	724-597-8600	Affiliate
Titus	296 Poplar Neck Road Birdsboro, PA	Berks County Cumru Twp.	610-378-8400	Affiliate
Tolna	Route 851 New Freedom, PA	York County Hopewell Twp.	717-338-3514	Affiliate
Warren	2325 Pennsylvania Ave West Ext Warren, PA	Warren County Conewango Twp.	814-723-1551	Affiliate
Wayne	Franklin Pike Road Cochrannton, PA	Crawford County Wayne Twp.	717-338-3514	Affiliate

**Provide the names and business addresses of all general partners of the applicant and parent and subsidiary corporations, if any.**

Name	Business Address

**List the names and business address of persons with overall management responsibility for the process being permitted (i.e. plant manager).**

Name	Business Address
Blossburg John Brummer	1731 Hunterstown Road Gettysburg, PA 17325
Brookville Maintenance Facility Jack Milburn	PO Box 78 Brookville, PA 15825
Conemaugh John Gritzer	1442 Power Plant Road New Florence, PA 15944
Gilbert Terminal Neil MacIntosh	2350 Applebutter Road Hellerstown, PA 18055
Hamilton John Brummer	1731 Hunterstown Road Gettysburg, PA 17325
Hunterstown John Brummer	1731 Hunterstown Road Gettysburg, PA 17325
Keystone James Lafontaine	313 Keystone Drive Shelocta, PA 15774
Mountain John Brummer	1731 Hunterstown Road Gettysburg, PA 17325
Orrtanna John Brummer	1731 Hunterstown Road Gettysburg, PA 17325
Southpointe Office Joseph DeGangi & Matt E. Greek	121 Champion Way Canonsburg, PA 15317
Portland William Wood	PO Box 238 Portland, PA 18351
Seward Gregory Mitchell	595 Power Plant Road New Florence, PA 15944
Shawnee William Wood	PO Box 238 Portland, PA 18351
Shawville Murray Kohan	PO Box 879 Shawville, PA 16873
Titus Jeffery Marks	296 Poplar Neck Road Birdsboro, PA 19508
Tolna John Brummer	1731 Hunterstown Road Gettysburg, PA 17325
Warren John Brummer	1731 Hunterstown Road Gettysburg, PA 17325
Wayne John Brummer	1731 Hunterstown Road Gettysburg, PA 17325

**Plan Approvals or Operating Permits.** List all plan approvals or operating permits issued by the Department or an approved local air pollution control agency under the APCA to the applicant or related parties that are currently in effect or have been in effect at any time 5 years prior to the date on which this form is notarized. This list shall include the plan approval and operating permit numbers, locations, issuance and expiration dates. Attach additional sheets as necessary.

<b>Air Contamination Source</b>	<b>Plan Approval/ Operating Permit#</b>	<b>Location</b>	<b>Issuance Date</b>	<b>Expiration Date</b>
See Attachment B				



**Compliance Background.** (Note: Copies of specific documents, if applicable, must be made available to the Department upon its request.) List all documented conduct of violations or enforcement actions identified by the Department pursuant to the APCA, regulations, terms and conditions of an operating permit or plan approval or order by applicant or any related party, using the following format grouped by source and location in reverse chronological order. Attach additional sheets as necessary. See the definition of "documented conduct" for further clarification. Unless specifically directed by the Department, deviations which have been previously reported to the Department in writing, relating to monitoring and reporting, need not be reported.

Date	Location	Plan Approval/ Operating Permit#	Nature of Documented Conduct	Type of Department Action	Status: Litigation Existing/Continuing or Corrected/Date	Dollar Amount Penalty
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See Attachment C

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List all incidents of deviations of the APCA, regulations, terms and conditions of an operating permit or plan approval or order by applicant or any related party, using the following format grouped by source and location in reverse chronological order. This list must include items both currently known and unknown to the Department. Attach additional sheets as necessary. See the definition of "deviations" for further clarification.

Date	Location	Plan Approval/ Operating Permit#	Nature of Deviation	Incident Status: Litigation Existing/Continuing Or Corrected/Date
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See Attachment D

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**CONTINUING OBLIGATION.** Applicant is under a continuing obligation to update this form using the Compliance Review Supplemental Form if any additional deviations occur between the date of submission and Department action on the application.

## VERIFICATION STATEMENT

Subject to the penalties of Title 18 Pa.C.S. Section 4904 and 35 P.S. Section 4009(b)(2), I verify under penalty of law that I am authorized to make this verification on behalf of the Applicant/Permittee. I further verify that the information contained in this Compliance Review Form is true and complete to the best of my belief formed after reasonable inquiry. I further verify that reasonable procedures are in place to ensure that "documented conduct" and "deviations" as defined in 25 Pa Code Section 121.1 are identified and included in the information set forth in this Compliance Review Form.



Signature

5-28-09

Date

Matt E. Greek

Name (Print or Type)

Vice President

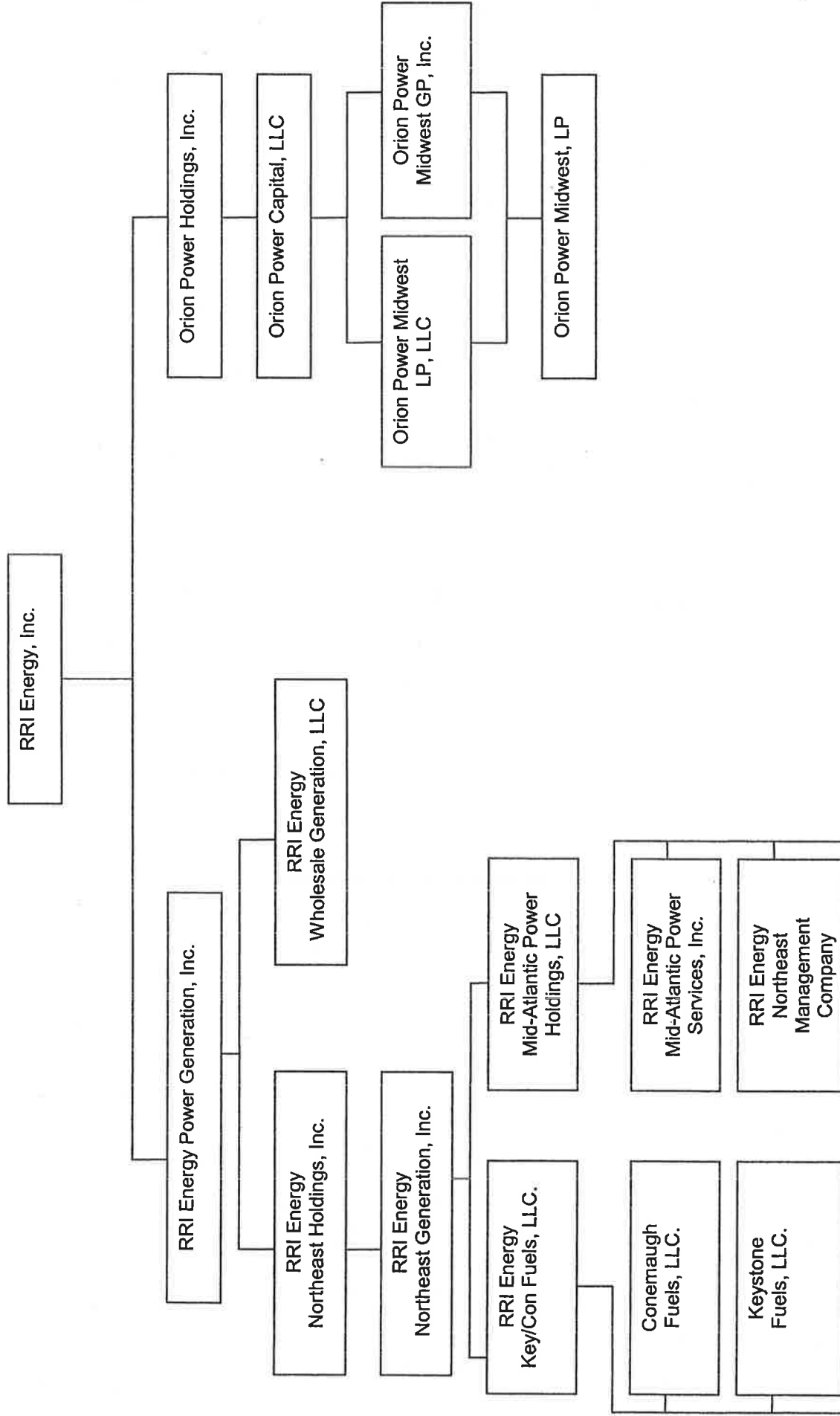
Title

**ATTACHMENT A**  
**Air Pollution Control Act Compliance Review Form**

**Attachment A**

**Corporate Diagrams**

# **ATTACHMENT A** Air Pollution Control Act Compliance Review Form



**ATTACHMENT B**  
**Air Pollution Control Act Compliance Review Form**

**Attachment B**

**Plan Approvals and Operating Permits List**

**ATTACHMENT B****Air Pollution Control Act Compliance Review Form**

The following table provides the Plan Approvals and Operating Permits of all facilities owned and/or operated by RRI Energy Wholesale Generation, LLC, RRI Energy Mid-Atlantic Power Holdings, LLC and/or RRI Energy Northeast Management Company.

Note: On November 24, 1999, the transfer of ownership of all air permits for the following facilities became effective with the purchase and transfer of ownership of Pennsylvania Electric Company's and Metropolitan Edison Company's assets to Sithe Pennsylvania Holdings LLC. On May 12, 2000, Reliant Energy Power Generation completed the purchase of Sithe Pennsylvania Holdings LLC and renamed it Reliant Energy Mid-Atlantic Power Holdings, LLC. On May 2, 2009, Reliant Energy, Inc was renamed RRI Energy, Inc.

LOCATION	SOURCE/PROGRAM	PERMIT/PLAN APPROVAL #	ISSUED	EXPIRED
Blossburg	State Only Operating Permit	SOOP - 59-00007 Renewal application submitted 02-21-2008	10-07-08 10-07-03	10-06-13 09-30-08
Conemaugh	Title V Operating Permit	TV 32-00059	3-28-08	3-28-13
	Phase II Acid Rain Permit	Renewal Application submitted 6-22-07	1-1-08 1-1-03	12-31-12 12-31-07
	Auxiliary Boiler B Replacement	PA-32-00059A Requested Plan Approval Extension 11-21-06 Admin. Amendment Requested 2-23-07 Included in 3-28-08 TVOP Renewal	5-24-06 12-5-06 3-26-07	11-24-07 4-26-07
	Coal Processing Plant	PA-32-00059B Plan Approval Extension	4-18-07 10-16-08	10-18-08 4-18-10
Hamilton	State Only Operating Permit	SOOP 01-05004 Renewal application submitted 02-21-2008	10-01-03	10-31-08
Hunterstown Reliant Energy Wholesale Generation, LLC	Amended Plan Approval	01-05029C	06/16/08	11/30/09
	Plan Approval Extension	01-05029	2-18-08	6-16-08
	Title V Operating Permit	01-05029	1-8-09	1-31-14
	Phase II Acid Rain Permit		1-29-09	1-31-14
Note: On November 5, 2004 Reliant Energy Hunterstown, LLC merged into Reliant Energy Wholesale Generation, LLC.				
Reliant Energy Hunterstown, LLC	Plan Approval	01-05029	06-15-00	06-30-04
Hunterstown	CT	01-05005	07/14/08	07/31/13
	CT	01-2005	2-22-95	1-31-00***
Keystone	Title V Operating Permit	03-00027	12-18-06	12-18-11
	FGD Plan Approval	PA-03-00027B	12-4-06	12-4-09

**ATTACHMENT B**  
**Air Pollution Control Act Compliance Review Form**

LOCATION	SOURCE/PROGRAM	PERMIT/PLAN APPROVAL #	ISSUED	EXPIRED
	Phase II Acid Rain Permit	Renewal Application submitted 6-22-07	1-1-08 1-1-03	12-21-12 12-31-07
Mountain	State Only Operating Permit	SOOP 21-05010 Renewal application submitted 02-21-2008	05-19-09 08-13-03	05-31-14 08-31-08
Orrtanna	State Only Operating Permit	SOOP 21-05006 Renewal application submitted 02-21-2008	09-25-03	09-30-08
Portland	Title V Operating Permit	48-00006	3-16-01	1-31-05
		Revised Title V Operating Permit Issued	2-16-01	1-31-05
		Revised Title V Operating Permit Issued	1-9-01	1-31-05
		Revised Title V Operating Permit Issued	12-22-00	1-31-05
		Revised Title V Operating Permit Issued	1-31-00	1-31-05
		Title V Operating Permit Effective (Appealed)		
		Renewal Application submitted 7-29-04		
		Draft Renewal issued 5-30-06		
	Phase II Acid Rain Permit	Renewal Application submitted 6-22-07	1-1-08 1-1-03	12-31-12 12-31-07
	Plan Approval	48-302-104	04-21-09	10-31-10
Note: On December 1, 2008 Reliant Energy Seward, LLC merged into Reliant Energy Wholesale Generation, LLC.				
Seward  Reliant Energy Wholesale Generation, LLC	Title V Operating Permit	TV 32-00040	9-19-00	9-19-05
		Requested change of ownership to Reliant Energy Seward, LLC 9-20-04. Permit Amended 12-23-04  Renewal Application submitted on April 1 2005		
	Phase II Acid Rain Permit	Renewal Application submitted 6-22-07	1-1-03	12-31-07
	Repowering Plan Approval	PA-32-040B	4-23-01	7-5-04
		Modified	6-11-07	
		Plan Approval Extension requested 2/25/09	04-09-09	10-11-09
Shawnee	State Only (Synthetic Minor) Operating Permit	45-00003	4-28-06	4-28-11

**ATTACHMENT B**  
**Air Pollution Control Act Compliance Review Form**

LOCATION	SOURCE/PROGRAM	PERMIT/PLAN APPROVAL #	ISSUED	EXPIRED
Shawville	Title V Operating Permit	Revision #1	02-15-03	10-31-05
		17-00001	11-7-00	10-31-05
		Renewal Application Submitted 4-26-05		
	Phase II Acid Rain Permit	Renewal Application submitted 6-22-07	1-3-03	12-31-07
	SNCR Installation, Boiler Nos. 1, 2, 3 & 4	17-00001C	5-1-06	9-27-07
		Plan Approval Extension Request Title V Administrative Amendment 06-19-08	2-22-08	6-21-08
	Ash Disposal Site Expansion	17-00001A	7-22-02	12-31-03
		Request Plan Approval Extension 12-10-03 Request Plan Approval Extension 10-1-04 Request Title V Administrative Amendment 11-15-05	12-22-03	10-16-04
	Plan Approval	17-00001D	05-01-09	11-01-10
Titus	Title V Operating Permit	06-05024	5-31-07	6-30-12
	Phase II Acid Rain Permit	Renewal Application submitted 6-22-07	1-1-04	12-31-08
	Plan Approval	06-05024C	1-16-09	7-31-10
Tolna	State Only Operating Permit	SOOP 67-05028	05-19-09	05-31-14
		Renewal application submitted 02-21-2008	08-26-03	08-31-08
Warren	Title V	62-00012	7-8-05	6-30-10
		Modified 11-21-08		
	Phase II Acid Rain Permit	Affected Units Retired	1-1-03	12-31-07
Wayne	Title V	TV-20-00265 Title V Operating Permit	06-13-03	05-31-08
		Revoked due to retirement 11-13-07		



**Attachment C**

**Compliance Background**

List only those changes since the date of the last original submission.

Date	Location	Plan Approval/ Operating Permit#	Nature of Documented Conduct	Type of Department Action	Status Litigation; Existing/Continuing; or corrected/Date	Dollar Amount Penalty
1/14/09	Keystone, Portland, and Shawville	03-00027 48-00006 17-00001	Failure to: obtain NSR, PSD and Minor NSR permits; install and operate pollution control equipment, and; submit timely and complete Title V permit applications for alleged modifications at facilities occurring from 1984 through 2007	NOV (issued by EPA Region 3)	Open	Open
3rd Q 2008	Portland	TV-48-00006	CEMS data delinquency violation – Unit 1 SO2	Quarterly Continuous Source Monitoring Report	On January 14, 2009, Reliant Energy submitted mitigation of penalty to \$0 request letter to PADEP	\$6,800 mitigated to \$2,000
03/13/08	Warren	TV 62-00012	Failure to submit semiannual deviation report within 30 days of end of reporting period	NOV	Closed by 4/7/08 PADEP letter Completed Semiannual deviation report form was resubmitted on 03/18/08.	None
2nd Q 2008	Shawville	17-00001	COMS data delinquency violation (Boilers 1 & 2)	Quarterly Continuous Source Monitoring Report	Resolution expected by Consent Assessment of Civil Penalty	\$3,000
1st Q 2008	Shawville	17-00001	COMS data delinquency violation (Boilers 1 & 2).	Quarterly Continuous Source Monitoring Report	Resolution expected by Consent Assessment of Civil Penalty	\$9,800
1st Q 2008	Shawville	17-00001	COMS data availability violation (Boilers 3 & 4).	Quarterly Continuous Source Monitoring Report	Resolution expected by Consent Assessment of Civil Penalty	\$25,600
1st Q 2008	Shawville	17-00001	COMS data availability violation (Boilers 1 & 2).	Quarterly Continuous Source Monitoring Report	Resolution expected by Consent Assessment of Civil Penalty	\$25,600

Date	Location	Plan Approval/ Operating Permit#	Nature of Documented Conduct	Type of Department Action	Status Litigation; Existing/Continuing; or corrected/Date	Dollar Amount Penalty
09/27/07	Seward	PA-32-040B	3rd. Q 2004 SO2 CEMS violations.	Consent Assessment of Civil Penalty (CACP)	The Department and Reliant Energy negotiated a settlement of the penalty. CACP executed 12/7/07.	\$5,000 mitigated to \$4,000
7/13/07	Shawville	17-00001	CEMS data delinquency violations (Boilers 3 & 4)	Consent Assessment of Civil Penalty	Resolved. Penalty paid.	\$1,700
12/06/06	Portland	TV-48-00006	4 <sup>th</sup> . Q 2006 NOx CEMS violations (CT-5)	Consent Assessment of Civil Penalty	Resolved. Penalty paid	\$150
10/3/06	Shawville	#17-00001C	Insufficient testing notice	NOV	N/A	None
3rd Q 2005	Conemaugh	TV-32-00059	CEMS data delinquency violation – Unit 1 SO2	Quarterly Continuous Source Monitoring Report	On January 14, 2009, Reliant Energy submitted mitigation of penalty to \$0 request letter to PADEP	\$1,600
2nd. Q 2005	Seward	PA-32-040B	COMS data delinquency violation	Quarterly Continuous Source Monitoring Report	Resolution expected by Consent Assessment of Civil Penalty	\$800
5/18/05	Conemaugh	TV 32-00059	Fugitive dust emissions	NOV received from PaDEP dated 5/24/05	Control plan submitted on 6/7/05. The violation was resolved effective 6/1/2005.	None
04/14/04	Shawville	17-00001	Violations of COMS data availability requirements for Unit Nos. 1 & 2 occurred during the 2nd Qtr 2002.	Consent Assessment of Civil Penalty	Resolved. Penalty paid.	\$4,000

## **Attachment D**

**List all incidents of deviations**

## Attachment D

Note: For constituents measured by continuous emission monitoring systems (CEMS), compliance with permit conditions are determined using the emissions data submitted to the Department in accordance with 25 Pa Code 139 requirements. Information regarding specific instances of deviations, if any, is included in the CEMS monitoring data reports that are submitted to the DEP on a quarterly basis.

Date	Location	Plan Approval/ Operating Permit#	Nature of Deviation	Incident Status: Existing/Continuing; or Corrected Date
4/6/09	Hunterstown	01-05029	CT-301 NOx shutdown emissions exceeded the permit limits due to operator error	Emissions exceedance occurred due to prolonged operation at loads around 40 MW. Shutdown procedure has been modified to ensure that emissions exceedances are avoided
8/13/08	Hunterstown	01-05029C	CT-101 NOx shutdown emissions exceeded the permit limits due to a system malfunction.	The malfunction involved the sudden and unexpected failure of a control system power supply/ control processor of Combustion Turbine CT-101. This failure resulted in above-normal emissions of nitrogen oxides (NOx). Upon discovery of the malfunction Hunterstown Station personnel initiated immediate investigative efforts, investigation revealed the failure of the processor, and as such, a shutdown of CT-101 was initiated and the processor was replaced.

Date	Location	Plan Approval/ Operating Permit#	Nature of Deviation	Incident Status: Existing/Continuing; or Corrected Date
1 <sup>st</sup> . Q 2008	Shawville	TVOP-17-00001	No quarterly Linearity Test was performed during the 4 <sup>th</sup> . Q 2007 on the Continuous Opacity Monitoring System (COMS) in accordance with the department's "Continuous Source Monitoring Manual" and as a result, during the 1 <sup>st</sup> . Q 2008, the COMS did not meet the minimum data capture requirements in accordance with the Department's "Continuous Source Monitoring Manual"	Because the COMS Linearity Test was not performed during the 4 <sup>th</sup> Q 2007, COMS data for the first 25 days in January 2008 were not considered valid. The Linearity Test was performed on 01/25/2008.
01/02/08	Hunterstown	Plan Approval No. 01-05029	* CT-101 CO emissions exceeded the permit limits for 1 hour.	At the end of the startup period, CT101's CO emissions did not reach its expected compliance levels. Station operators took immediate action, including increasing unit load for CO compliance. However, during Hour 15, the hourly average CO emissions were in excess of those specified in the permit. Operations personnel continue to work with General Electric to identify and resolve this problem and has also amended procedures to prevent future occurrences.
7/10/07	Titus	06-05024	Opacity exceedance resulting from Unit 1 ESP malfunction on 7/10/07 from 13:33 HRS to 14:04 HRS. Immediate phone report followed by written report on 7/12/07.	Load reduced and ESP repaired.

Date	Location	Plan Approval/ Operating Permit#	Nature of Deviation	Incident Status: Existing/Continuing; or Corrected Date
06/08/07	Hunterstown	Plan Approval No. 01-05029	* CT-101 NOx emissions exceeded the permit limits for 1 hour.	Station management will review the event with CT operations personnel to raise the level of awareness of excess emissions. Operations personnel continue to work with General Electric to identify and resolve this problem.
12/09/06	Portland	TV-48-00006	On December 9, 2006, CT-5's NOx emissions during the period beginning 0800 hrs and ending 1140 hrs. exceeded the hourly permit limit of 164 Lbs/Hr. (PNG).	During this period, CT-5 remained in the "diffusion" (start-up) operation mode due to the malfunction of the control valve for water injection for NOx control. The valve operated sufficiently to provide for NOx control, but it did not close properly during the "diffusion" to "premix" transfer which resulted in CT-5 remaining in the "diffusion" operating mode.
07/24/06	Seward	TV-32-00040 Section C, Cond. #001	Ash was leaking from the No. 2B trough inspection door resulting in fugitive air contaminants.	The No. 2B fly ash trough was in high alarm at approx 1635 Hrs. Ash began to leak from the No. 2B inspection door. The entrained ash was observed leaking from the man door at about 1655 Hrs. There were no visible emissions leaving the property. Corrective action plan was established at 1813 Hrs.
07/21/06	Keystone	TV-03-00027 Section C, Cond. #011	Partial loss of power to the electrostatic precipitators due to an electrical cable fire caused excess stack opacity on Unit #2 for a period of 64 minutes.	At approximately 15:40 Hrs, 5 of the 16 T/R sets on the Unit 2-B ESP tripped because of a power cable tray fire. Boiler load was immediately lowered to approx. 400 MW, SCR removed from service. Load increase at 19:20 Hrs after power was restored to unaffected T/R sets, SCR returned to service. Full report submitted to PADEP on 08/04/06.



Date	Location	Plan Approval/ Operating Permit#	Nature of Deviation	Incident Status: Existing/Continuing; or Corrected Date
05/31/06	Conemaugh	TV 32-00059 Section E, Cond. #003	On May 31, 2006, Unit 1 SO <sub>2</sub> emissions during the period beginning 2100 hrs and ending 2359 hrs were 5143 lbs. Exceeding the 3-hr. permit limit of 4968 lbs.	During this period, because of "D" absorber problems, station operators made a switch to the "B" absorber, following normal station procedures for this change. Immediately after the switch, SO <sub>2</sub> emissions increased. Despite several corrective action efforts to this absorber, SO <sub>2</sub> emissions did not decrease and the "D" absorber was placed back into service. Station operation determined that the cause of the poor performance of the "B" absorber was caused by a substantial number of plugged spray nozzles in the #5v header.
05/30/06	Portland	48-00006	CT-5 operated without water injection during NO <sub>x</sub> CEMS linearity test during the period beginning 1458 Hrs and 1708 Hrs EST	Because the NO <sub>x</sub> CEMS was undoing linearity testing, station operation personnel were unaware of the water injection malfunction. Immediately after the conclusion of the linearity test, station operation became aware of the malfunction and took correction actions to restore water injection.
10/19/05	Titus	06-05024	Failed to conduct a full daily inspection	Resumed inspections and reemphasized plant responsibility for completing inspections
06/24/05	Hunterstown	Plan Approval No. 01-05029	* CT-101 Exceeded Startup time. NO <sub>x</sub> and CO emissions exceeded the permit limits for 1 hour.	Operator Error – Corrected during the week of June 27, 2005.

Date	Location	Plan Approval/ Operating Permit#	Nature of Deviation	Incident Status: Existing/Continuing; or Corrected Date
06/06/05	Hunterstown	Plan Approval No. 01-05029	CT201 NOx emissions exceeded the 3.5 ppm limit for 1 hour.	The exceedance occurred while the unit dropped below the 60% operational threshold (approx. 75 GMW) for a period of approx. 10 minutes. NH3 flow to the SCR shuts off automatically (for catalyst protection) when the unit drops below 75 GMW. The unit was not taken out of service. NH3 flow to the SCR was restarted (automatically) when the unit ramped through the 75 GMW point and then recovered. The NOx average for that hour exceeded the permit limit of 3.5 ppm.
06/5/05	Hunterstown	Plan Approval No. 01-05029	CT301 CO emissions exceeded the 10.0 ppm limit for 1 hour.	The exceedance occurred while the unit was operating at a load range of 110 - 135 megawatts. General Electric was contacted on June 6, 2005 to evaluate and resolve the problem.
05/12/05	Hunterstown	Plan Approval No. 01-05029	* CT-201 exceeded Cold Startup time. * CT301 NOx emissions exceeded the 3.5 ppm limit for 3 hours. * CT301 CO emissions exceeded the 10.0 ppm limit for 2 hours.	These exceedances were the result of plant process malfunctions that occurred during the first startup event following the station's annual inspection outage and have since been corrected.
05/09/05	Shawville	TVOP 17-00001 Sec. C/#001	Ash silo leak caused visible emissions from fly ash unloading room. Access door leak caused the problem.	Leak was discovered at 09:15 and was stopped by shutting down the fluidizing blower at 10:45. Bracing was added to stop the leaking door. Door will be permanently repaired by 5/30/05. Affected area was cleaned by a contract vacuum truck.  Incident reported to Bruce Vandergrift of DEP via telephone immediately following discovery.

Date	Location	Plan Approval/ Operating Permit#	Nature of Deviation	Incident Status: Existing/Continuing; or Corrected Date
05/07/05	Seward	32-00040 Section C Condition #001	2B ash line "T" failure.  Visible particulate emissions from ash transport line.	Duration of leak approximately 09:45 to 10:00. Boiler load shed, valve and line repaired by 13:50. Area cleaned up with the assistance of contract vacuum truck.  Tom Roberts called DEP regional hotline to report the incident at 12:00.
04/20/05	Hunterstown	Plan Approval No. 01-05029	CT101 NOx emissions exceeded the 3.5 ppm limit for 2 hours.	Operator Error – Corrected during the week of June 27, 2005
04/04/05	Hunterstown	Plan Approval No. 01-05029	CT301 CO emissions exceeded the 10.0 ppm limit for 1 hour.	Operator Error – Corrected during the week of June 27, 2005
03/12/05	Hunterstown	Plan Approval No. 01-05029	CT201 and CT301 CO emissions exceeded the 10.0 ppm limit for 1 hour.	Operator Error – Corrected during the week of June 27, 2005
03/11/05	Hunterstown	Plan Approval No. 01-05029	CT101 CO emissions exceeded the 10.0 ppm limit for 3 hours and CT301 NOx emissions exceeded the 3.5 ppm limit for 1 hour.	Operator Error – Corrected during the week of June 27, 2005
02/20/05	Hunterstown	Plan Approval No. 01-05029	* CT-301 exceeded Cold Startup time. * CT-301 CO emissions exceeded the 10.0 ppm limit for 1 hour and CT301 NOx emissions exceeded the 3.5 ppm limit for 1 hour.	Start-up time exceedance due to multiple process malfunctions (frozen IP Drum feedwater control valve, air-cooled condenser vacuum pump failures, runbacks associated with high- pressure superheater spray line, and investigation of additional process alarms.) Station personnel corrected the problems. Plant personnel in the process of purchasing protective covers for the IP Feedwater Valves to mitigate water migration into housing. Plant personnel have addressed seal water issues in Vacuum Pump trip. PADEP was notified by telephone on 2/22/05 with written response on 3/2/05.

Date	Location	Plan Approval/ Operating Permit#	Nature of Deviation	Incident Status: Existing/Continuing; or Corrected Date
09/02/04	Keystone	TV-03-00027 Sec. E #005	SO2 emissions in excess of 4.0 lbs/mmBtu: Units 1 and 2 -Hours: 2100/2300. (CEM monitored, not stack test results)	Reliant surmises that a relatively small amount of out-of-spec coal was delivered by a supplier that managed to circumvent fuel QA checks. Additional measures, including the potential elimination of problem suppliers, will be implemented by Key/Con Fuels (fuel manager for Keystone Station).
07/16/04	Conemaugh	TV 32-00059	On July 16, 2004, Unit 1 SO2 emissions during the period beginning 1500 hrs and ending 1759 hrs were 5044 lbs. Exceeding the 3-hr. permit limit of 4968 lbs.	During this period, the coal supply to Unit 1 was abnormal (higher sulfur & ash with lower HHV) resulting in scrubber chemistry problems. Station personnel took immediate corrective actions (increased DBA dosage, additional absorber pumps, more aeration, etc.) including reducing boiler load. Boiler load was not increased until the scrubber chemistry conditions returned to normal levels to comply with SO2 emission limits.
3/29/04	Seward	32-00040 Section C Condition #001	Visible particulate emissions from #3 Ash Silo flanges.	DEP informed via call to Tim Kuntz. Duration 10:38 to 13:46 on 3/29/04. Problem corrected by sealing flanges.
1/31/04	Titus	06-05024 Section C Condition #011 for Source ID 033	On 01/31/04 excess stack opacity on Unit No. 3 was reported to PADEP because of a malfunctioning ash evacuation system on the ESP	Boiler load reduced and the malfunctioning ash evacuation system was corrected. The duration of the excess stack opacity was 25 minutes. Compliance is determined in accordance with the Department's enforcement policy for CEMS systems.
1/1/04	Portland	48-00006 Section D, for Source ID 103, Condition#012.	Although emissions were characterized in the annual AIMS report, there was failure to submit the CT-5 Annual Compliance Report by 01/30/03	Report for operating year 2003 was submitted to PADEP before 01/30/04. Internal permit tickler/tracking system has been updated to provide adequate reminders for timely future report submittals.

Date	Location	Plan Approval/ Operating Permit#	Nature of Deviation	Incident Status: Existing/Continuing; or Corrected Date
Year 2004	Hunterstown	Plan Approval No. 01-05029	CT101, CT201, & CT301 NOx emissions exceeded the 3.5 ppm limit for a total of 25 hours. CO emissions exceeded the 10.0 ppm limit for a total of 11 hours	Initial startup operation and continuing shakedown process under the Plan Approval 01-05029.
CONTINUING OBLIGATION: Applicant is under a continuing obligation to update this form using the Compliance Review Supplemental Form if any additional documented conduct occur or related parties develop between the date of submission and Department action on its application				

